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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,)	NO. 16-CR-00373-EJD-1
)	
Plaintiff,)	EX PARTE MOTION FOR SEALING ORDER
)	
v.)	
)	
GOYKO GUSTAV KUBUROVICH,)	
)	
Defendant.)	

The United States, by and through counsel, moves this Court for an order sealing Exhibit 2 to the Government's Opposition to Defendant's Motion for Compassionate Release from Custody (Dkt. 189). Exhibit 2 consists of Defendant's Bureau of Prisons medical records, which have already been disclosed to Defendant. Although there is a general presumption in favor of public access to court records, the need to protect the confidentiality and privacy of Defendant's medical records outweighs this presumption of public access. *San Ramon Reg'l Med. Ctr., Inc. v. Principal Life Ins. Co.*, No. 10-CV-02258 SBA, 2011 WL 89931, at *1 (N.D. Cal. Jan. 10, 2011) (citing *Webb v. Smart Document Sols., LLC*, 499 F.3d 1078, 1082 (9th Cir. 2007)).

Accordingly, the United States requests that the Court seal these documents, except that the Clerk of Court shall provide copies of the sealed documents to the Parties. The United States further

1 requests that the United States Attorney's Office be permitted to share these documents as necessary to
2 comply with its discovery obligations.

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4 DATED: July 29, 2020

Respectfully submitted,

5 DAVID L. ANDERSON
6 United States Attorney


7 /s/ Scott Simeon
8 SCOTT SIMEON
9 Assistant United States Attorney

10 **~~PROPOSED~~ ORDER**

11 Upon motion of the United States and good cause having been shown,

12 **IT IS HEREBY ORDERED** that Exhibit 2 to the Government's Opposition to Defendant's
13 Motion for Compassionate Release from Custody (Dkt. 189) shall be filed under seal until further order
14 of the Court, except that the Clerk of Court shall provide copies of the sealed documents to the Parties.
15 The United States Attorney's Office is permitted to share these documents as necessary to comply with
16 its discovery obligations.

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18 DATED: July 30, 2020

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20 HON. EDWARD J. DAVILA
21 United States District Judge
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